

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

E. ALLEN REEVES, INC.
Plaintiff,

v.
MICHAEL GRAVES & ASSOCIATES,
INC.
Defendant.

MICHAEL GRAVES & ASSOCIATES,
INC.
Counterclaimant,

v.
E. ALLEN REEVES, INC.
Counterdefendant.

MICHAEL GRAVES & ASSOCIATES,
INC.
Third Party Plaintiff,

v.
DAVID CHOU & ASSOCIATES; KELTER
& GILLIGO CONSULTING ENGINEERS;
FISHER MARANTZ STONE, INC.; THE
ARTS COUNCIL OF PRINCETON; SAL
ARNONE; JOHN DOES 1-50,
Third Party Defendants.

CIVIL ACTION

NO: 3:10-CV-01393-JAP-TJB

RECEIVED

AUG 17 2012

AT 8:30
WILLIAM T. WALSH
CLERK

JOINT STIPULATION TO EXTEND DEADLINES

Plaintiff, E. Allen Reeves, Inc. ("Reeves"), Defendant/Third-party Plaintiff, Michael Graves & Associates, Inc. ("Graves") and Third-party Defendants David Chou & Associates ("Chou"), Kelter & Gilligo Consulting Engineers ("K&G"), The Arts Council of Princeton ("ACP") and Sal Arnone, (collectively referred to herein as the "Parties"), hereby stipulate as follows:

1. The Close of Factual Depositions in the instant matter was originally scheduled for June 29, 2012.

2. By joint stipulation, entered as an Order by the Court on July 5, 2012, the Close of Factual Depositions was extended August 31, 2012 and the deadlines for Affirmative expert reports, Rebuttal expert reports and Third-party rebuttal expert reports were extended to September 7, October 12 and November 16, 2012 respectively.

3. The Parties are currently engaged in finalizing the schedule of depositions of fourteen (14) party witnesses and one (1) third-party witness, including coordinating the schedules of attendance for counsel of the parties.

4. To date, several depositions have been adjourned due to existing conflicts for the parties being deposed.

5. Moreover, on or about July 30, 2012, Plaintiff Reeves and Defendant Graves agreed to resume mediation of this matter with the Honorable Judge James D. Clyne, Retired.

6. Accordingly, a mediation session was held between Plaintiff Reeves and Defendant Graves on Thursday, August 2, 2012 and Reeves and Graves intend to continue mediation of this matter during the course of the next several weeks.

7. Therefore, the Parties, by stipulation and subject to approval of the Court, hereby request that the Court extend the Close of Factual Depositions established by this Court's January 5, 2012 Case Management Order until October 5, 2012.

8. The deadline for bringing discovery or case management disputes to the attention of the Court is currently scheduled for September 7, 2012.

9. In light of the requested extension for depositions to continue beyond September 7, 2012, the Parties, by stipulation and subject to approval of the Court, hereby request that the Court extend the deadline for bringing discovery or case management disputes to the Court until November 2, 2012.

10. Further, the Parties, by stipulation and subject to approval of the Court, hereby request that the Court extend the deadline for Affirmative expert reports to October 5, 2012, the deadline for Rebuttal expert reports to November 2, 2012 and the deadline for Third-party rebuttal expert reports to November 30, 2012.

11. The Case Management Order currently states that “[e]xtensions to extend discovery beyond [the] dispositive motion [deadline] date [of December 14, 2012] must meet manifest injustice standard if denied.”

12. This deadline has not yet passed and the parties are not requesting an extension to discovery beyond said December 14, 2012 deadline.

13. This extension shall not affect any other deadlines set forth in the Court’s January 5, 2012 Case Management Order.

COHEN SEGLIAS PALLAS
GREENHALL & FURMAN, P.C.

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Date: August 16, 2012

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*Attorneys for The Arts Council of Princeton
and Sal Arnone*

Date: August 16, 2012

SO ORDERED, this 16 day of August, 2012.


_____ J.